

Setur Marinas

Community Investment Policy

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1. PURPOSE AND SCOPE

The purpose of this Community Investment Policy (“**the Policy**”) is to put forward the principles to adopt while developing community investment initiatives. Setur Marinas recognizes the impact of its operations on its stakeholders, the environment, and community at large and emphasizes significance of sustainable development.

This Policy, which is an integral part of Setur Marinas Code of Ethics¹, is developed to demonstrate Setur Marinas’ commitment to making a positive impact on the welfare and sustainable development of related communities and the environment engaged with as a corporate citizen.

Setur Marinas is committed to conducting business in conformity with the highest ethical standards. As a signatory to the UN Global Compact², Koç Holding A.Ş. complies with and ensures that all Koç Group companies act in compliance with UN Global Compact’s 10 Principles.

This Policy is a reflection of Koç Holding’s sustainability approach: “Lead. Together”, as well as Koç Group Sustainability Guide.

2. DEFINITIONS

“**Koç Group**” means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

“**Setur Marinas**” refers to Tek-Art Kalamış and Fenerbahçe Marmara Tourism Facilities Inc. And its subsidiaries (marinas), Demre Marina Management Inc., Setur Yalova Marina Management Inc., Ayvalık Marina and Yacht Management Industry Trade Inc., Setur Antalya Marina Management Inc., which are subsidiaries of Tek-Art Kalamış and Fenerbahçe Marmara Tourism Facilities Inc., Makmarin Kaş Marina Management Tourism and Trade Inc., and all companies directly or indirectly controlled by Tek-Art Kalamış and Fenerbahçe Marmara Tourism Facilities Inc. or the other companies listed above, either alone or jointly, and the joint ventures included in the consolidated financial statements of these companies. New marina branches and companies that will be directly or indirectly controlled by the companies listed above during the period this Policy remains in effect are also included in the definition of “Setur Marinas.”

“**Social Investment**” refers to strategic relationships and collaborations established by the company with individuals and legal entities to address social and environmental issues with the aim of achieving long-term corporate benefits and enhancing reputation.

“**Sustainable Development Goals**”³ refers to the 17 goals that form part of the “2030 Agenda for Sustainable Development,” a 15-year plan adopted by UN Member States to address global challenges related to poverty, inequality, climate, environmental degradation, welfare, peace,

¹ Please refer to Setur Marinas Code of Ethics for details.

² <https://www.unglobalcompact.org/what-is-gc/mission/principles>

³ <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

and justice.

“The UN” means the United Nations.

“The UN Global Compact”⁴ is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labour, the environment and anti-corruption.

3. GENERAL PRINCIPLES

Setur Marinas conducts “Due Diligence”⁵ on organizations or individuals that are supported by Koç Group or the relevant group company, to ensure that Community Investments are met by the reliable parties with sound purposes.

Setur Marinas ensures that Community Investments, including those with organizations or individuals, abide by Setur Marinas Ethics Code, Human Rights Policy, Donations and Sponsorship Policy, Anti-Bribery and Corruption Policy and other relevant policies.

Applying to memberships of the regional, national, or international organizations, or being signatory to agreements related to Community Investments require ensuring compliance with the UN Global Compact Principles as it may affect Setur Marinas’ reputation.

4. APPLICATION OF THE POLICY

While making Community Investments, in line with Setur Marinas Sustainability Guide⁶, Setur Marinas consider the following:

- whether the relevant Community Investment is compatible with the priorities and needs of the regions where business activities are carried out,
- Providing a clear connection between Community Investment activities and business strategy,
- Establishing strong partnerships with civil society organizations, international organizations, universities or individuals in order to put forward applicable solutions,
- Ensuring that the objectives and results of the Community Investments are measurable and scalable by design, and the results have the potential to be disseminated across other businesses and regions, and
- Ensuring that they are aligned with the social and environmental goals, as mentioned in the UN Sustainable Development Goals.

5. AUTHORITY AND RESPONSIBILITIES

⁴ <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

⁵ Please refer to Setur Marinas Sanctions and Export Controls Policy

⁶ <https://www.koc.com.tr/sustainability>.

This Policy is to provide guidance in developing Community Investment initiatives for all employees, directors and officers of Setur Marinas. If you notice any action you believe to be inconsistent with this Policy, you are required to seek guidance from Setur Marinas Sustainability Unit, the responsible function.

6. REVISION HISTORY

This Policy, adopted by Setur Marinas, entered into force with the approval of the Board of Directors on 31.01.2023, and Setur Marinas Legal and Compliance Counsel is responsible for updating the Policy.

Revision	Date	Comment
No: 1	13.05.2024	Some definitions have been improved.